

**Delaware**  
**Division of Air Quality**  
**2012 - 2016**  
**Air Toxics Strategic Plan**

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**The Air Toxics Strategic Plan (ATSP) is a five-year plan of activities to be undertaken by the Division of Air Quality and its partners to reduce the risk of adverse health effects caused by the inhalation of air toxics.**

**The 2012 - 2016 ATSP, finalized on December 28, 2011, is organized within the following strategic components.**

- **Implement an on-going program to address the risks from exposure to air toxics**
- **Build a greater understanding of ambient air toxics environment**
- **Identify potential harm from exposure to air toxics**
- **Gather information related to air toxics sources**
- **Identify options for reducing air toxics in the environment**
- **Implement appropriate actions to reduce the harm from exposure to air toxics**
- **Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics**
- **Enhance DAQ air toxics resources**

# 2012

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2012**

<b>Implement an on-going program to address the risks from exposure to air toxic</b>	
1.	Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.
a.	Review status and complete year-end status report on the 2011 individual Strategic Plans.
b.	Track implementation and report year-end-status of the 2011 Air Toxics Strategic Plan by 3/31/12.
c.	Review status and complete mid-year status report on the 2012 individual Strategic Plans.
d.	Track implementation and report mid-year status on the 2012 Air Toxics Strategic Plan by 9/30/12.
e.	Facilitate the development of a GAP analysis within the elements of the strategic planning process and incorporate the results into the development of the 2013 Air Toxics Strategic Plan by 10/31/12.
f.	Updating of the Air Toxics Strategic Plan for 2013-2017
i.	Review and revise, if needed, Air Toxics Area Source Program and timing, as part of the 2013 Air Toxics Strategic Plan by 10/12.
ii.	Coordinate development of the 2013 Air Toxics Strategic Plan.
iii.	Update individual Strategic Plans for 2013-2017.
iv.	Update and finalize 2013 Air Toxics Strategic Plan for years 2013 to 2017 by 12/31/12.
2.	Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.
3.	Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.
4.	Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.
5.	Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.
6.	Review and revise, if needed, air toxics area source activities and timing as part of the 2013 Air Toxics Strategic Plan by 12/12.
7.	Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.

### **Year 2012**

<b>Build greater understanding of ambient air toxics environment</b>	
1.	Determine ambient air toxics concentrations for selected HAPs in Delaware.
a.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
b.	Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
c.	Continue to collaborate with University of Delaware on air toxics research and special projects.
d.	Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc. This project is currently <b>ON HOLD</b> pending finding funding to repair the unit.
e.	Complete and issue the "Community Air Toxics" final report by 3/31/12.
f.	Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.
g.	Continue to support the gas chromatographic mass spectrometer platform operations and maintenance through additional monitoring activities.
h.	Undertake new or special monitoring needs that may surface.
2.	Provide air toxics modeling support to meet community and internal needs.
3.	Conduct "remote sensing" study to meet PM 2.5 testing required under the State Implementation Plan.

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2012**

<b>Identify potential harm from exposure to air toxics</b>	
1.	Provide modeling support to Air Quality's Community Air Toxics Study (CATS), pending the completion of the CATS.
2.	Provide modeling support to Engineering & Compliance associated with risk-based permitting decisions, as needed.
3.	Analyze monitoring data from completed special monitoring projects and refine air toxics model, if appropriate.
a.	Analyze ultra-fine particle data collected by DNREC, University of Delaware, and Duke University.
b.	Continue source apportionment analysis focusing on the air toxics of concern.
i.	Contribution of mobile sources versus stationary sources, as resources become available.
ii.	Diesel particulate matter, as resources become available.
iii.	Residential wood stoves, as resources become available.
4.	Characterize the cancer and non-cancer risks through future air toxics assessment programs.
a.	Coordinate ongoing risk assessment support and guidance of DPH for air toxics risk reduction activities.

### **Year 2012**

<b>Gather information related to air toxics sources</b>	
1.	Develop and submit the 2011 NEI for HAPs by 12/31/12.
2.	Provide emissions inventory support to the air toxics education and reduction programs, as required.
3.	Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics, as needed.
4.	By 12/12, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
5.	Until data entry problems with AFS (via DENs) are resolved, continue to improve the consolidated source data base by entering all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.
6.	Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2012.
7.	Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.

## 2012 - 2016 Air Toxics Strategic Plan

### Year 2012

<b>Identify options for reducing air toxics in the environment</b>	
1.	Continue to monitor federal activities associated with the new Lead NAAQS and communicate any EPA proposed actions/decisions impacting Delaware.
2.	Provide technical assistance on lightering operations to DAQ and Ozone Transport Commission, as needed.
3.	Continue to support Division of Air Quality efforts to determine when to phase out Stage II requirements.
4.	Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
a.	Participate in inter-agency consultation (IAC) workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.
b.	Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.
5.	Continue participation in the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.
6.	Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
7.	Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.
a.	Newly proposed amendments to federal air toxics and incinerator standards.
i.	Area source Prepared Feeds Manufacturing GACT Standard (Federal Sub DDDDDDD).
ii.	Electric Arc Furnace MACT Standard (Federal Sub YYYYY).
iii.	Industrial, Commercial & Institutional Boiler MACT Standard (Federal Sub DDDDD).
iv.	Commercial and Industrial Solid Waste Incinerator Standard (Federal Sub CCCC).
b.	Newly proposed federal residual risk standards.
i.	Chromium Electroplating Standard (Federal Sub N).
ii.	Secondary Aluminum Production Standard (Federal Sub RRR).
iii.	Aerospace Manufacturing and Rework Facilities Standard (Federal Sub GG).
iv.	Petroleum Refineries Standard (Federal Sub CC).
8.	Continue to implement review protocols and evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the proposed rules, as appropriate.
a.	Newly proposed amendments to federal air toxics and incinerator standards.
b.	Newly proposed federal residual risk standards.
9.	Identify grant and funding opportunities.
a.	Facilitate the identification, preparation and submission for transportation-related grants or other funding.
10.	Evaluate the need for the development of additional Source Category Permits to address air toxics issues.
11.	Identify Delaware appropriate options under the multi-state Transportation & Climate Initiative (TCI) to reduce greenhouse gases and air toxics from the transportation sector.
12.	Reevaluate the "Smoking Vehicle Reduction Program" options.
a.	Complete baseline testing of smoking vehicles program.
b.	Review baseline testing results and identify funding of program, if implementation is warranted.

## 2012 - 2016 Air Toxics Strategic Plan

### Year 2012

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
1.	Facilitate the implementation of mobile source diesel emission reduction projects.
a.	Facilitate the implementation of diesel retrofits.
i.	Complete retrofits of DelDOT and DNREC trucks by 3/31.
b.	Complete final Port of Wilmington engine replacement project by 6/30.
c.	Complete Wilmington Tug diesel engine repowering project by 6/30.
d.	Continue to support of the SmartWay Transport programs.
i.	Continue to monitor usage of kiosk service systems at diesel truck electrification sites.
ii.	Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate.
e.	Continue to identify mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.
2.	Insure continued or improved compliance of stationary sources.
a.	Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT and residual risk standards) in accordance with the applicable compliance monitoring plan.
b.	Perform full compliance evaluations (FCEs) of facilities subject to area source air toxics standards as follows:
i.	The three (3) chrome plating facilities, subject to 1138 Sect 6, covered during the 2012-13 timeframe.
ii.	The one (1) halogenated solvent degreaser, subject to 1138 Sect 8, covered during the 2012-13 timeframe.
iii.	The one (1) hazardous waste combustor, subject to Federal Sub EEE, covered during the 2012-13 timeframe.
iv.	The three (3) municipal solid waste landfills, subject to Federal Sub AAAA, covered during the 2012-13 timeframe.
v.	The two (2) hospital ethylene oxide sterilization facilities, subject to 1138 Sect 9, covered during the 2012-13 timeframe.
vi.	The one (1) lead acid battery manufacturing plant, subject to 1138 Sect 11, covered during the 2012-13 timeframe.
vii.	The one (1) source, subject to electric arc furnace standard (Federal Sub YYYYYY), covered during the 2012-13 timeframe.
viii.	The two (2) plating and polishing operations, subject to 1138 Sect 10, covered during the 2012-13 timeframe.
ix.	40% or ~10 miscellaneous parts and products surface coating facilities, subject to 1138 Sect 14, covered during the 2012-13 timeframe; total potential population is ~25 facilities.
x.	The one (1) asphalt processing and asphalt roofing products manufacturing operation, subject to 1138 Sect 16, covered during the 2012-13 timeframe.
c.	By 9/12, perform compliance evaluations (CE) at area air toxics sources as follows:
i.	25% or ~20 perchloroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~80 facilities.
ii.	25% or ~40 motor vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11 and 1138 Sect 15; total population is ~160 facilities.
iii.	10% or ~60 gasoline delivery vessels; total population is ~600 facilities.
d.	Track annual testing of Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing requirements of Regulation 1124.
e.	Conduct inspections at one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124, during 2012; total population is ~355 facilities.
f.	Continue to implement the Asbestos Demolition/Renovation Program.
i.	Perform site inspections at asbestos demolition/renovation sites.
ii.	Monitor and maintain the Delaware Online Asbestos Notification System (DOANS).
iii.	Educate the public, certified contractors, and professional service firms on the proper removal and disposal of asbestos.
g.	Take enforcement against gasoline dispensing facilities that are non-compliant with Stage 1 and Stage 2 requirements.

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2012**

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
h.	Incorporate updated MACT and Residual Risk requirements in air permits.
i.	Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.
ii.	Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation No. 1130, as needed.
i.	Incorporated area source standard requirements during renewal or reopening of Title V permits, including
i.	Miscellaneous parts and products manufacturing facilities to include paint stripping (1138 Sect 13) and spray applied surface coating (1138 Sect 14) requirements, if applicable.
j.	Standard Engineering to include Plating and Polishing Operations (1138 Sect 10) requirements by 6/12.
i.	Johnson Controls to include Lead Acid Battery Manufacturing Plant (1138 Sect 11) requirements by 6/12.
ii.	St. Francis Hospital to include Hospital Ethylene Oxide Sterilizers (1138 Sect 9) requirements by 6/12.
iii.	Industraplate to include Plating and Polishing Operations (1138 Sect 10) requirements by 6/12.
iv.	Standard Engineering to include Plating and Polishing Operations (1138 Sect 10) requirements by 6/12.
v.	New and existing miscellaneous parts and products manufacturing facilities to include paint stripping (1138 Sect 13) and surface coating (1138 Sect 14) requirements.
vi.	IKO to include Asphalt Processing and Asphalt Roofing Products Manufacturing Operations (1138 Sect 16) requirements.
vii.	New sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).
viii.	Newly identified existing sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5) by 12/12.
ix.	New sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
x.	Newly identified existing sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15) by 12/12.
k.	Review and approve Stage I and Stage II permit applications at gasoline dispensing facilities.
l.	Continue Compliance Assistance Program consistent with the Compliance Assistance Oversight Plan for sources subject to the Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
3.	Implement other air toxics-related communications and outreach programs
a.	Continue to implement a diesel anti-idling educational program.
i.	Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.
ii.	Evaluate and revise anti-idling outreach programs for schools, as needed.
iii.	Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.
b.	Actively promote the development and implementation of educational programs.
i.	Continue working with the DVRPC on educational programs for . . .
1.	Air Quality Partnership.
ii.	Continue working with the Clean Air Council on educational programs for . . .
1.	Air Quality Partnership.
2.	Diesel Difference Programs.
3.	Delaware Diesel Difference Program.
4.	SmartWay Transport Programs.
iii.	Continue working with EPA Region on educational programs for . . .
1.	SmartWay Transport Programs.
2.	Delaware Diesel Difference Program.
iv.	Continue working with Delaware Division of Energy and Climate on educational programs for the Clean Cities program.
c.	Continue to provide guidance and assistance to the DAQ's Community Air Toxics team in their development and implementation of a communication program.



## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2012**

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
d.	Provide guidance and assistance to DAQ's programs on development and implementation of their educational and outreach programs, when needed.
e.	Continue to collaborate with other DNREC agencies on educational outreach activities associated with promoting the diesel emission reductions.
f.	Review existing educational information on mobile source emission/impacts and develop a communication plan to address the key issues for Delaware.
g.	Continue to participate in Claymont Coalition meetings.
h.	Continue to improve compliance with Delaware's open burning requirements.
i.	Continue to educate the public on Delaware's open burning restrictions.
ii.	Provide non-compliance prevention guidance for open burning activities.
i.	Review existing Area Source outreach/communication programs and determine whether changes or additional programs are needed.
4.	Implement at least one new opportunity to increase small business awareness of actions that small businesses can take to reduce risk from exposure to air toxics including regulatory.
5.	Continue to enhance the value and use of the air toxics information on DAQ's web sites.
a.	Continue to provide pertinent and timely information to the public and regulated community on DAQ's "Proposed Regulations" web site during the adoption of new air toxics standards.
b.	Continue to improve and enhance the content, ease of accessing, and information flow for "Air Toxics" on the DAQ web site.
c.	Review and update, if needed, to continuously improve the information on the Area Source Compliance web pages.
6.	Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.
a.	Coordinate the identification of known or potentially affected sources, update the area source inventory and send inventory report to EPA by 9/12, if required.
b.	Coordinate the development and incorporation of new and newly revised standards into the Area Source Program – Implementation Plan as part of the Air Toxics Strategic Planning process.
c.	Update the Area Source Program – Implementation Plan by 10/12, if needed.
7.	Submit delegation package for
a.	Residual risk standard applicable to Halogenated Solvent Cleaning (Federal Sub T) by 1Q/12.
8.	Adopt new and amend existing air toxics regulations for mobile and stationary sources.
a.	Submit Start Action Notices for
i.	Infrastructure standard applicable to General Provisions (Federal Sub A) by 6/30/12.
ii.	Area source standard applicable to Industrial, Commercial & Institutional Boilers (Federal Sub JJJJJ) by 9/30/12.
iii.	Area source standard applicable to Fabricated Metal Products Manufacturing (Federal Sub XXXXXX) by 12/31/12.
iv.	Adopting a new non-road anti-idling regulation similar to the recently approved OTC model rule by March 31.
b.	Complete stringency determinations for
i.	Area standard applicable to Prepared Feeds Manufacturing (Federal Sub DDDDDDD) by 3Q/12.
ii.	Infrastructure standard applicable to General Provisions (Federal Sub A) by 4Q/12.
c.	Finalize adoption of a new non-road anti-idling regulation similar to the recently approved OTC model rule by December 31.
d.	Finalize the adoption of area source standards for
i.	Area standard applicable to Prepared Feeds Manufacturing (Federal Sub DDDDDDD) by 4Q/12.
e.	Upon initial proposal of CAL-LEV III and the federal TIER III, evaluate the regulatory options or other paths forward for implementation of automobile low emission standards in Delaware.
f.	Reevaluate and develop path forward for amending Regulation 1131, which would expand the low enhanced inspection and maintenance (I/M) program statewide.

## 2012 - 2016 Air Toxics Strategic Plan

### Year 2012

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
g.	Revise existing and develop new control strategies, as needed.
i.	Complete review and submit a negative evaluation declaration letter regarding existing sewage sludge incinerators under Federal Subpart MMMM by 2/28/12.
ii.	Assess path forward for the following MACT standards.
1.	Utilities MACT Standard (Federal Sub UUUUU), if finalized.
2.	Industrial, Commercial & Institutional Boiler MACT Standard (Federal Sub DDDDD), if finalized.
3.	Commercial and Industrial Solid Waste Incinerator Standard (Federal Sub CCCC), if finalized.
iii.	Update path forward for area source Prepared Feeds Manufacturing GACT Standard (Federal Sub DDDDDDD).
iv.	Develop path forward for applicable area source residual risk standards finalized in 2012.
1.	Develop path forward to amend 1138 Sect 6, if the Chromium Electroplating residual risk requirements (Federal Sub N) are finalized in 2012.
2.	Develop path forward to amend 1138 Sect 12, if the Secondary Aluminum Production residual risk requirements (Federal Sub RRR) are finalized in 2012.
h.	Complete initial stringency determination between Federal Area Source Standards vs. existing Delaware regulations and develop regulatory path forward, if necessary.
i.	Infrastructure standard applicable to General Provisions (Federal Sub A) by 2Q/12.
ii.	Area source standard applicable to Industrial, Commercial & Institutional Boilers (Federal Sub JJJJJ) by 3Q/12.
iii.	Area source standard applicable to Fabricated Metal Products Manufacturing (Federal Sub XXXXXX) by 4Q/12.
i.	As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between DAQ and small businesses.
j.	Provide support to small businesses on air toxics related issues.
i.	Continue to provide compliance assistance to small business as DAQ continues to adopt new regulations applicable area sources.
1.	Provide compliance assistance during the adoption of the area source Industrial, Commercial & Institutional Boiler rule (Federal Sub JJJJJ).
9.	Continue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.
10.	Continue to improve the inspection and maintenance (I/M) program reporting process.
11.	Continue to provide air toxics-related support to State through. . .
a.	Reviewing of air permits.
b.	Providing current regulatory interpretations.
c.	Advising on likely future trends and actions.
d.	Providing technical support, as needed.

### Year 2012

<b>Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics</b>	
1.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
2.	Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics, as needed.
3.	By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2012**

<b>Air toxics resource development</b>	
1.	Evaluate available training and encourage broader participation in risk-related training.
a.	Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
b.	Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
c.	Evaluate the need for air toxics-related training for staff and present, as needed.
d.	Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.
2.	Improve staff's ability to identify affected area sources by providing training on applicability requirements for air toxics area source standards adopted under 112(k).
a.	Review and finalize the appropriate format for a staff training program on the applicability requirements of air toxics area source standards by 3/31/12.
b.	Develop an air toxics educational program (presentation and educational materials) that facilitates the interpretation of the applicability requirements of area source standards adopted by EPA under Section 112(k) by 5/31/12.
c.	Complete area source applicability training program by 6/30/12.
3.	Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels.
4.	Develop and implement mechanisms to improve air toxics communications.
a.	Continue to implement newly found mechanisms to improve air toxics communications between branches.
b.	Continue to promote open communications between DNREC and small businesses on air toxics issues.

# 2013

## 2012 - 2016 Air Toxics Strategic Plan

### Year 2013

<b>Implement an on-going program to address the risks from exposure to air toxic</b>	
1.	Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.
a.	Review status and complete year-end status report on the 2012 individual Strategic Plans.
b.	Track implementation and report year-end-status of the 2012 Air Toxics Strategic Plan.
c.	Review status and complete mid-year status report on the 2013 individual Strategic Plans.
d.	Track implementation and report mid-year status on the 2013 Air Toxics Strategic Plan.
e.	Continue to conduct GAP analyses within the strategic planning process and incorporate the results into the development of the 2014 Air Toxics Strategic Plan.
f.	Updating of the Air Toxics Strategic Plan for 2014-2018
i.	Review and revise, if needed, air toxics area source program and timing, as part of the 2014 Air Toxics Strategic Plan by 10/13.
ii.	Coordinate development of the 2014 Air Toxics Strategic Plan.
iii.	Update individual Strategic Plans for 2014-2018.
iv.	Update and finalize 2014 Air Toxics Strategic Plan for years 2014 to 2018.
2.	Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.
3.	Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.
4.	Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.
5.	Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.
6.	Review and revise, if needed, air toxics area source activities and timing as part of the 2014 Air Toxics Strategic Plan by 12/13.
7.	Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.

### Year 2013

<b>Build greater understanding of ambient air toxics environment</b>	
1.	Determine ambient air toxics concentrations for selected HAPs in Delaware.
a.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
b.	Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
c.	Continue to collaborate with University of Delaware on air toxics research and special projects.
d.	Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.
e.	Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.
f.	Continue to support the gas chromatographic mass spectrometer platform operations and maintenance through additional monitoring activities.
g.	Undertake new or special monitoring needs that may surface.
2.	Provide air toxics modeling support to meet community and internal needs.
3.	Conduct "remote sensing" study to meet PM 2.5 testing required under the State Implementation Plan.

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2013**

<b>Identify potential harm from exposure to air toxics</b>	
1.	Characterize the cancer and non-cancer risks associated with 2008 National Air Toxics Assessment (2008 NATA).
a.	Complete evaluation of the 2008 NATA results, communicate findings, if warranted, and respond to inquiries, as appropriate.
b.	Review 2008 NATA findings and assess potential impact of dry cleaning, gasoline distribution and motor vehicle surface coating air toxics on the public's health, as needed.
c.	Review communication materials associated with the release of EPA's NATA 2008 results for Delaware, as needed.
2.	Provide modeling support to Engineering & Compliance associated with risk-based permitting decisions, as needed.
3.	Analyze monitoring data from completed special monitoring projects and refine air toxics model, if appropriate.
a.	Analyze ultra-fine particle data collected by DNREC, University of Delaware, and Duke University.
b.	Continue source apportionment analysis focusing on the air toxics of concern, as needed.

### **Year 2013**

<b>Gather information related to air toxics sources</b>	
1.	Provide emissions inventory support to the air toxics education and reduction programs, as required.
2.	Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics, as needed.
3.	By 12/13, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
4.	By 12/13, identify and enter into AFS (via DENs) all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.
5.	Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2013.
6.	Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.

### **Year 2013**

<b>Identify options for reducing air toxics in the environment</b>	
1.	Provide technical assistance on lightering operations to DAQ, as needed.
2.	Continue to support Division of Air Quality efforts to determine when to phase out Stage II requirements.
3.	Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
a.	Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.
b.	Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.
4.	Continue participation in the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.
5.	Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
6.	Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.
a.	Newly proposed amendments to federal air toxics and incinerator standards.
b.	Newly proposed federal residual risk standards.
7.	By 12/13, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
a.	Newly proposed amendments to federal air toxics and incinerator standards.
b.	Newly proposed federal residual risk standards.

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2013**

<b>Identify options for reducing air toxics in the environment</b>	
8.	Identify grant and funding opportunities.
a.	Facilitate the identification, preparation and submission for transportation-related grants or other funding.
b.	Identify funding to implement Delaware appropriate options under the multi-state Transportation & Climate Initiative (TCI) to reduce greenhouse gases and air toxics from the transportation sector.
9.	Evaluate the need for the development of additional Source Category Permits to address air toxics issues.

### **Year 2013**

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
1.	Promote the implementation of mobile source air toxics reduction initiatives/programs.
a.	Facilitate the implementation of diesel retrofits.
b.	Continue to support of the SmartWay Transport programs.
i.	Continue to monitor usage of kiosk service systems at diesel truck electrification sites.
ii.	Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate.
c.	Continue to identify mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.
2.	Insure continued or improved compliance of stationary sources.
a.	Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT and residual risk standards) in accordance with the applicable compliance monitoring plan.
b.	Perform full compliance evaluations (FCEs) of facilities subject to area source air toxics standards as follows:
i.	The three (3) chrome plating facilities, subject to 1138 Sect 6, covered during the 2012-13 timeframe.
ii.	The one (1) halogenated solvent degreaser, subject to 1138 Sect 8, covered during the 2012-13 timeframe.
iii.	The one (1) hazardous waste combustor, subject to Federal Sub EEE, covered during the 2012-13 timeframe.
iv.	The three (3) municipal solid waste landfills, subject to Federal Sub AAAA, covered during the 2012-13 timeframe.
v.	The two (2) hospital ethylene oxide sterilization facilities, subject to 1138 Sect 9, covered during the 2012-13 timeframe.
vi.	The one (1) lead acid battery manufacturing plant, subject to 1138 Sect 11, covered during the 2012-13 timeframe.
vii.	The one (1) source, subject to electric arc furnace standard (Federal Sub YYYYYY), covered during the 2012-13 timeframe.
viii.	The two (2) plating and polishing operations, subject to 1138 Sect 10, covered during the 2012-13 timeframe.
ix.	40% or ~10 miscellaneous parts and products surface coating facilities, subject to 1138 Sect 14, covered during the 2012-13 timeframe; total potential population is ~25 facilities.
x.	The one (1) asphalt processing and asphalt roofing products manufacturing operation, subject to 1138 Sect 16, covered during the 2012-13 timeframe.
xi.	The six (6) prepared feed operations, subject to Federal Sub DDDDDDD, covered during the 2012-13 timeframe.
c.	By 9/13, perform compliance evaluations (CE) at area air toxics sources as follows:
i.	25% or ~20 perchloroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~80 facilities.
ii.	25% or ~40 motor vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11 and 1138 Sect 15; total population is ~160 facilities.
iii.	10% or ~60 gasoline delivery vessels; total population is ~600 facilities.
d.	Track annual testing of Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing requirements of Regulation 1124.
e.	Conduct inspections at one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124, during 2013; total population is ~355 facilities.

## 2012 - 2016 Air Toxics Strategic Plan

### Year 2013

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
f.	Continue to implement the Asbestos Demolition/Renovation Program.
i.	Perform site inspections at asbestos demolition/renovation sites.
ii.	Monitor and maintain the Delaware Online Asbestos Notification System (DOANS).
iii.	Educate the public, certified contractors, and professional service firms on the proper removal and disposal of asbestos.
g.	Take enforcement against gasoline dispensing facilities that are non-compliant with Stage 1 and Stage 2 requirements.
h.	Incorporate updated MACT and Residual Risk requirements in air permits.
i.	Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.
1.	Camdel Metals to include Halogenated Solvent Cleaning System (1138 Sect 8) residual risk requirements.
ii.	Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation No. 1130, as needed.
i.	Incorporate area source standard requirements into natural and synthetic minor source permits, including
i.	New sources subject to Prepared Feed Operations (1138 Sect 17) requirements.
ii.	New sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).
iii.	Newly identified existing sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).
iv.	New sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
v.	Newly identified existing sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
i.	Review and approve Stage I and Stage II permit applications at gasoline dispensing facilities.
j.	Continue Compliance Assistance Program consistent with the Compliance Assistance Oversight Plan for sources subject to the Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
3.	Implement other air toxics-related communications and outreach programs
a.	Continue to implement a diesel anti-idling educational program.
i.	Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.
ii.	Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.
b.	Actively promote the development and implementation of educational programs.
i.	Continue working with the DVRPC on educational programs for . . .
1.	Air Quality Partnership.
ii.	Continue working with the Clean Air Council on educational programs for . . .
1.	Air Quality Partnership.
2.	Diesel Difference Programs.
3.	Delaware Diesel Difference Program.
4.	SmartWay Transport Programs.
iii.	Continue working with EPA Region on educational programs for . . .
1.	SmartWay Transport Programs.
2.	Delaware Diesel Difference Program.
iv.	Continue working with Delaware Division of Energy and Climate on educational programs for the Clean Cities program.
c.	Provide guidance and assistance to DAQ's programs on development and implementation of their educational and outreach programs, when needed.



## 2012 - 2016 Air Toxics Strategic Plan

### Year 2013

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
d.	Continue to collaborate with other DNREC agencies on educational outreach activities associated with promoting the diesel emission reductions.
e.	Continue to participate in Claymont Coalition meetings.
f.	Continue to improve compliance with Delaware's open burning requirements.
i.	Continue to educate the public on Delaware's open burning restrictions.
ii.	Continue to provide non-compliance prevention guidance for open burning activities.
g.	Modify the Area Source outreach/communication programs to incorporate needed changes or additions.
4.	Implement at least one new opportunity to increase small business awareness of actions that small businesses can take to reduce risk from exposure to air toxics including regulatory.
5.	Continue to enhance the value and use of the air toxics information on DAQ's web sites.
a.	Continue to provide pertinent and timely information to the public and regulated community on DAQ's "Proposed Regulations" web site during the adoption of new air toxics standards.
b.	Continue to improve and enhance the content, ease of accessing, and information flow for "Air Toxics" on the DAQ web site.
c.	Review and update, if needed, to continuously improve the information on the Area Source Compliance web pages.
6.	Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.
a.	Coordinate the identification of known or potentially affected sources, update the area source inventory and send inventory report to EPA by 9/13, if required.
b.	Coordinate the development and incorporation of new and newly revised standards into the Area Source Program – Implementation Plan as part of the Air Toxics Strategic Planning process.
c.	Update the Area Source Program – Implementation Plan by 10/13, if needed.
7.	Adopt new and amend existing air toxics regulations for mobile and stationary sources.
a.	Submit Start Action Notices for
i.	Adopting the area standard applicable to Gasoline Distribution Operations (Federal SubBBBBBB) by 2Q/13.
b.	Complete stringency determinations for
i.	Area source standard applicable to Industrial, Commercial & Institutional Boilers (Federal SubJJJJJJ) by 1Q/13.
ii.	Area source standard applicable to Fabricated Metal Products Manufacturing (Federal SubXXXXXX) by 3Q/13.
c.	Finalize the adoption of area source standards for
i.	Infrastructure standard applicable to General Provisions (Federal Sub A) by 1Q/13.
ii.	Area source standard applicable to Industrial, Commercial & Institutional Boilers (Federal SubJJJJJJ) by 2Q/13.
d.	Submit delegation package for
i.	Area standard applicable to Prepared Feeds Manufacturing (Federal SubDDDDDDD) by 1Q/13.
ii.	Infrastructure standard applicable to General Provisions (Federal Sub A) by 2Q/13.
e.	Revise existing and develop new control strategies, as needed.
i.	Develop path forward for applicable area source air toxics standards finalized in 2013.
ii.	Develop path forward for residual risk standards applicable area sources finalized in 2013.
f.	Complete initial stringency determination between Federal Area Source Standards vs. existing Delaware regulations and develop regulatory path forward, if necessary.
i.	Area standard applicable to Gasoline Distribution Operations (Federal SubBBBBBB) by 2Q/13.
8.	As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between DAQ and small businesses.

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2013**

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
9.	Provide support to small businesses on air toxics related issues.
a.	Continue to provide compliance assistance to small business as DAQ continues to adopt new regulations applicable area sources.
i.	Provide compliance assistance during the adoption of the area source Industrial, Commercial & Institutional Boiler rule (Federal Sub JJJJJ).
ii.	Provide compliance assistance during the adoption of the area source Fabricated Metal Products rule (Federal Sub XXXXXX).
iii.	Provide compliance assistance during the adoption of the area source Gasoline Distribution rule (Federal Sub BBBB).
10.	Continue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.
11.	Continue to improve the inspection and maintenance (I/M) program reporting process.
12.	Continue to provide air toxics-related support to State through. . .
a.	Reviewing of air permits.
b.	Providing current regulatory interpretations.
c.	Advising on likely future trends and actions.
d.	Providing technical support, as needed.

### **Year 2013**

<b>Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics</b>	
1.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
2.	Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics, as needed.
3.	By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.

### **Year 2013**

<b>Air toxics resource development</b>	
1.	Evaluate available training and encourage broader participation in risk-related training.
a.	Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
b.	Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
c.	Evaluate the need for air toxics-related training for staff and present, as needed.
d.	Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.
2.	Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels.
3.	Develop and implement mechanisms to improve air toxics communications.
a.	Continue to implement newly found mechanisms to improve air toxics communications between branches.
b.	Continue to promote open communications between DNREC and small businesses on air toxics issues.

# 2014

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2014**

<b>Implement an on-going program to address the risks from exposure to air toxic</b>	
1.	Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.
a.	Review status and complete year-end status report on the 2013 individual Strategic Plans.
b.	Track implementation and report year-end-status of the 2013 Air Toxics Strategic Plan.
c.	Review status and complete mid-year status report on the 2014 individual Strategic Plans.
d.	Track implementation and report mid-year status on the 2014 Air Toxics Strategic Plan.
e.	Continue to conduct GAP analyses within the strategic planning process and incorporate the results into the development of the 2015 Air Toxics Strategic Plan.
f.	Updating of the Air Toxics Strategic Plan for 2015-2019
i.	Review and revise, if needed, air toxics area source program and timing, as part of the 2014 Air Toxics Strategic Plan by 10/14.
ii.	Coordinate development of the 2015 Air Toxics Strategic Plan.
iii.	Update individual Strategic Plans for 2015-2019.
iv.	Update and finalize 2015 Air Toxics Strategic Plan for years 2015 to 2019.
2.	Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.
3.	Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.
4.	Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.
5.	Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.
6.	Review and revise, if needed, air toxics area source activities and timing as part of the 2015 Air Toxics Strategic Plan by 12/14.
7.	Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.

### **Year 2014**

<b>Build greater understanding of ambient air toxics environment</b>	
1.	Determine ambient air toxics concentrations for selected HAPs in Delaware.
a.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
b.	Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
c.	Continue to collaborate with University of Delaware on air toxics research and special projects.
d.	Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.
e.	Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.
f.	Continue to support the gas chromatographic mass spectrometer platform operations and maintenance through additional monitoring activities.
g.	Undertake new or special monitoring needs that may surface.
2.	Provide air toxics modeling support to meet community and internal needs.

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2014**

<b>Identify potential harm from exposure to air toxics</b>	
1.	Characterize the cancer and non-cancer risks associated with 2008 National Air Toxics Assessment (2008 NATA).
a.	Explore contribution of mobile source air toxics emissions to the health risk using information available from NATA 2008, when or if available.
2.	Provide modeling support to Engineering & Compliance associated with risk-based permitting decisions, as needed.
3.	Analyze monitoring data from completed special monitoring projects and refine air toxics model, if appropriate.
a.	Analyze ultra-fine particle data collected by DNREC, University of Delaware, and Duke University.
b.	Continue source apportionment analysis focusing on the air toxics of concern, as needed.

### **Year 2014**

<b>Gather information related to air toxics sources</b>	
1.	Develop emissions inventory protocol for the implementation of the 2014 NEI, if needed.
2.	Provide emissions inventory support to the air toxics education and reduction programs, as required.
3.	Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics, as needed.
4.	By 12/14, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
5.	By 12/14, identify and enter into AFS (via DENs) all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.
6.	Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2014.
7.	Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.

### **Year 2014**

<b>Identify options for reducing air toxics in the environment</b>	
1.	Provide technical assistance on lightering operations to DAQ, as needed.
2.	Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
a.	Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.
b.	Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.
3.	Continue participation in the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.
4.	Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
5.	Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.
a.	Newly proposed amendments to federal air toxics and incinerator standards.
b.	Newly proposed federal residual risk standards.
6.	Continue to implement review protocols and evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the proposed rules, as appropriate.
a.	Newly proposed amendments to federal air toxics and incinerator standards.
b.	Newly proposed federal residual risk standards.
7.	Identify grant and funding opportunities.
a.	Facilitate the identification, preparation and submission for transportation-related grants or other funding.
8.	Evaluate the need for the development of additional Source Category Permits to address air toxics issues.

## 2012 - 2016 Air Toxics Strategic Plan

### Year 2014

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
1.	Promote the implementation of mobile source air toxics reduction initiatives/programs.
a.	Facilitate the implementation of diesel retrofits.
b.	Continue to support of the SmartWay Transport programs.
i.	Continue to monitor usage of kiosk service systems at diesel truck electrification sites.
ii.	Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate.
c.	Facilitate Delaware appropriate options under the multi-state Transportation & Climate Initiative (TCI) to reduce greenhouse gases and air toxics from the transportation sector.
d.	Continue to identify mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.
2.	Insure continued or improved compliance of stationary sources.
a.	Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT and residual risk standards) in accordance with the applicable compliance monitoring plan.
b.	Perform full compliance evaluations (FCEs) of facilities subject to area source air toxics standards as follows:
i.	The three (3) chrome plating facilities, subject to 1138 Sect 6, covered during the 2014-15 timeframe.
ii.	The one (1) halogenated solvent degreaser, subject to 1138 Sect 8, covered during the 2014-15 timeframe.
iii.	The one (1) hazardous waste combustor, subject to Federal Sub EEE, covered during the 2014-15 timeframe.
iv.	The three (3) municipal solid waste landfills, subject to Federal Sub AAAA, covered during the 2014-15 timeframe.
v.	The two (2) hospital ethylene oxide sterilization facilities, subject to 1138 Sect 9, covered during the 2014-15 timeframe.
vi.	The one (1) lead acid battery manufacturing plant, subject to 1138 Sect 11, covered during the 2014-15 timeframe.
vii.	The one (1) source, subject to electric arc furnace standard (Federal Sub YYYYYY), covered during the 2014-15 timeframe.
viii.	The two (2) plating and polishing operations, subject to 1138 Sect 10, covered during the 2014-15 timeframe.
ix.	40% or ~10 miscellaneous parts and products surface coating facilities, subject to 1138 Sect 14, covered during the 2014-15 timeframe; total potential population is ~25 facilities.
x.	The one (1) asphalt processing and asphalt roofing products manufacturing operation, subject to 1138 Sect 16, covered during the 2014-15 timeframe.
xi.	The six (6) prepared feed operations, subject to Federal Sub DDDDDDD, covered during the 2014-15 timeframe.
xii.	The industrial, commercial, institutional boilers, subject to Federal Sub JJJJJJ, covered during the 2014-15 timeframe, as appropriate.
c.	By 9/14, perform compliance evaluations (CE) at area air toxics sources as follows:
i.	25% or ~20 perchloroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~80 facilities.
ii.	25% or ~40 motor vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11 and 1138 Sect 15; total population is ~160 facilities.
iii.	10% or ~60 gasoline delivery vessels; total population is ~600 facilities.
d.	Track annual testing of Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing requirements of Regulation 1124.
e.	Conduct inspections at one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124 or Federal Sub CCCCCC, whichever is applicable, during 2014; total population is ~355 facilities.
f.	Continue to implement the Asbestos Demolition/Renovation Program.
i.	Perform site inspections at asbestos demolition/renovation sites.
ii.	Monitor and maintain the Delaware Online Asbestos Notification System (DOANS).
iii.	Educate the public, certified contractors and professional service firms on the proper removal and disposal of asbestos.

## 2012 - 2016 Air Toxics Strategic Plan

### Year 2014

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
g.	Take enforcement against gasoline dispensing facilities that are non-compliant with Stage 1 and Stage 2 requirements.
h.	Incorporate updated MACT and Residual Risk requirements in air permits.
i.	Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.
ii.	Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation No. 1130, as needed.
iii.	Incorporate area source standard requirements into natural and synthetic minor source permits, including
1.	New and existing facilities subject to Prepared Feed Operations (1138 Sect 17) requirements.
2.	New sources subject to area source Industrial Commercial Institutional Boiler (Federal Sub JJJJJ) requirements, as appropriate.
i.	Continue to incorporate Area Source Standard requirements into natural minor source permits, as necessary, for
i.	New sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).
ii.	Newly identified existing sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).
iii.	New sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
iv.	Newly identified existing sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
j.	Review and approve Stage I and Stage II permit applications at gasoline dispensing facilities.
k.	Continue Compliance Assistance Program consistent with the Compliance Assistance Oversight Plan for sources subject to the Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
3.	Implement other air toxics-related communications and outreach programs
a.	Continue to implement a diesel anti-idling educational program.
i.	Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.
ii.	Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.
b.	Actively promote the development and implementation of educational programs.
i.	Actively promote the development and implementation of educational programs.
1.	Air Quality Partnership.
ii.	Continue working with the Clean Air Council on educational programs for . . .
1.	Air Quality Partnership.
2.	Diesel Difference Programs.
3.	Delaware Diesel Difference Program.
4.	SmartWay Transport Programs.
iii.	Continue working with EPA Region on educational programs for . . .
1.	SmartWay Transport Programs.
2.	Delaware Diesel Difference Program.
iv.	Continue working with Delaware Division of Energy and Climate on educational programs for the Clean Cities program.
c.	Provide guidance and assistance to DAQ's programs on development and implementation of their educational and outreach programs, when needed.
d.	Continue to collaborate with other DNREC agencies on educational outreach activities associated with promoting the diesel emission reductions.
e.	Continue to participate in Claymont Coalition meetings.
f.	Continue to improve compliance with Delaware's open burning requirements.
i.	Continue to educate the public on Delaware's open burning restrictions.
ii.	Continue to provide non-compliance prevention guidance for open burning activities.
4.	Implement at least one new opportunity to increase small business awareness of actions that small businesses can take to reduce risk from exposure to air toxics including regulatory.

## 2012 - 2016 Air Toxics Strategic Plan

### Year 2014

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
5.	Continue to enhance the value and use of the air toxics information on DAQ's web sites.
a.	Continue to provide pertinent and timely information to the public and regulated community on DAQ's "Proposed Regulations" web site during the adoption of new air toxics standards.
b.	Continue to improve and enhance the content, ease of accessing, and information flow for "Air Toxics" on the DAQ web site.
c.	Review and update, if needed, to continuously improve the information on the Area Source Compliance web pages.
6.	Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.
7.	Adopt new and amend existing air toxics regulations for mobile and stationary sources.
a.	Submit Start Action Notices for
i.	Adopting the residual risk standard applicable to Chromium Electroplating (Federal Sub T).
ii.	Adopting the area standard applicable to Paint and Allied Products Manufacturing (Federal Sub CCCCCC).
b.	Complete stringency determinations for
i.	Area standard applicable to Gasoline Distribution Operations (Federal Sub BBBBBB).
ii.	Residual risk standard applicable to Chromium Electroplating (Federal Sub T).
c.	Finalize the adoption of area source standards for
i.	Area standard applicable to Fabricated Metal Products Manufacturing (Federal Sub XXXXXX).
ii.	Area standard applicable to Gasoline Distribution Operations (Federal Sub BBBBBB).
d.	Submit delegation package for
i.	Area standard applicable to Fabricated Metal Products Manufacturing (Federal Sub XXXXXX).
ii.	Area standard applicable to Gasoline Distribution Operations (Federal Sub BBBBBB).
e.	Revise existing and develop new control strategies, as needed.
i.	Develop path forward for applicable area source air toxics standards finalized in 2014.
ii.	Develop path forward for residual risk standards applicable area sources finalized in 2014.
f.	Complete initial stringency determination between Federal Area Source Standards vs. existing Delaware regulations and develop regulatory path forward, if necessary.
i.	Residual risk standard applicable to Chromium Electroplating (Federal Sub T).
ii.	Area standard applicable to Paint and Allied Products Manufacturing (Federal Sub CCCCCC).
8.	As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between DAQ and small businesses.
9.	Provide support to small businesses on air toxics related issues.
a.	Provide compliance assistance to small business during the implementation of Delaware's area source Industrial, Commercial & Institutional Boiler regulation.
b.	Continue to provide compliance assistance to small business as DAQ continues to adopt new regulations applicable area sources.
i.	Provide compliance assistance during the adoption of the area source Fabricated Metal Products rule (Federal Sub XXXXXX).
ii.	Provide compliance assistance during the adoption of the area source Gasoline Distribution rule (Federal Sub BBBBBB).
iii.	Provide compliance assistance during the adoption of the Chromium Electroplating rule (Federal Sub N).
10.	Continue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.
11.	Continue to improve the inspection and maintenance (I/M) program reporting process.
12.	Continue to provide air toxics-related support to State through . . .
a.	Reviewing of air permits.
b.	Providing current regulatory interpretations.
c.	Advising on likely future trends and actions.
d.	Providing technical support, as needed.



**Year 2014**

<p align="center"><b>Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics</b></p>
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|---|
| 1. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate. |
| 2. Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics, as needed.   |
| 3. By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.    |

**Year 2014**

<p align="center"><b>Air toxics resource development</b></p>
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| 1. Evaluate available training and encourage broader participation in risk-related training.   |
| a. Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.  |
| b. Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.   |
| c. Evaluate the need for air toxics-related training for staff and present, as needed.   |
| d. Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.  |
| 2. Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels. |
| 3. Develop and implement mechanisms to improve air toxics communications.  |
| a. Continue to implement newly found mechanisms to improve air toxics communications between branches.   |
| b. Continue to promote open communications between DNREC and small businesses on air toxics issues.  |

# 2015

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2015**

<b>Implement an on-going program to address the risks from exposure to air toxic</b>	
1.	Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.
a.	Review status and complete year-end status report on the 2014 individual Strategic Plans.
b.	Track implementation and report year-end-status of the 2014 Air Toxics Strategic Plan.
c.	Review status and complete mid-year status report on the 2015 individual Strategic Plans.
d.	Track implementation and report mid-year status on the 2015 Air Toxics Strategic Plan.
e.	Continue to conduct GAP analyses within the strategic planning process and incorporate the results into the development of the 2016 Air Toxics Strategic Plan.
f.	Updating of the Air Toxics Strategic Plan for 2016-2020
i.	Review and revise, if needed, air toxics area source program and timing, as part of the 2016 Air Toxics Strategic Plan by 10/15.
ii.	Coordinate development of the 2016 Air Toxics Strategic Plan.
iii.	Update individual Strategic Plans for 2016-2020.
iv.	Update and finalize 2016 Air Toxics Strategic Plan for years 2016 to 2020.
2.	Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.
3.	Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.
4.	Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.
5.	Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.
6.	Review and revise, if needed, air toxics area source activities and timing as part of the 2016 Air Toxics Strategic Plan by 12/15.
7.	Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.

### **Year 2015**

<b>Build greater understanding of ambient air toxics environment</b>	
1.	Determine ambient air toxics concentrations for selected HAPs in Delaware.
a.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
b.	Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
c.	Continue to collaborate with University of Delaware on air toxics research and special projects.
d.	Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.
e.	Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.
f.	Continue to support the gas chromatographic mass spectrometer platform operations and maintenance through additional monitoring activities.
g.	Undertake new or special monitoring needs that may surface.
2.	Provide air toxics modeling support to meet community and internal needs.

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2015**

<b>Identify potential harm from exposure to air toxics</b>	
1.	Characterize the cancer and non-cancer risks associated with 2011 National Air Toxics Assessment (2011 NATA).
a.	Complete evaluation of the 2011 NATA results, communicate findings, if warranted, and respond to inquiries, as appropriate.
b.	Review 2011 NATA findings and assess potential impact of dry cleaning, gasoline distribution and motor vehicle surface coating air toxics on the public's health, as needed.
c.	Review communication materials associated with the release of EPA's NATA 2011 results for Delaware, as needed.
2.	Provide modeling support to Engineering & Compliance associated with risk-based permitting decisions, as needed.
3.	Analyze monitoring data from completed special monitoring projects and refine air toxics model, if appropriate.
a.	Analyze ultra-fine particle data collected by DNREC, University of Delaware, and Duke University.
b.	Continue source apportionment analysis focusing on the air toxics of concern, as needed.

### **Year 2015**

<b>Gather information related to air toxics sources</b>	
1.	Develop and submit the 2014 NEI for HAPs by 12/31/15.
2.	Provide emissions inventory support to the air toxics education and reduction programs, as required.
3.	Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics, as needed.
4.	By 12/15, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
5.	By 12/15, identify and enter into AFS (via DENs) all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.
6.	Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2015.
7.	Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.

### **Year 2015**

<b>Identify options for reducing air toxics in the environment</b>	
1.	Provide technical assistance on lightering operations to DAQ, as needed.
2.	Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
a.	Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.
b.	Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.
3.	Continue participation in the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.
4.	Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
5.	Identify and evaluate the risk reductions and funding needs of optional paths forward to reduce the public health risk from mobile source air toxics emissions based on evaluation of information available from DAQ and/or NATA 2008, if appropriate.
6.	Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.
a.	Newly proposed amendments to federal air toxics and incinerator standards.
b.	Newly proposed federal residual risk standards.

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2015**

<b>Identify options for reducing air toxics in the environment</b>	
7.	Continue to implement review protocols and evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the proposed rules, as appropriate.
a.	Newly proposed amendments to federal air toxics and incinerator standards.
b.	Newly proposed federal residual risk standards.
8.	Identify grant and funding opportunities.
a.	Facilitate the identification, preparation and submission for transportation-related grants or other funding.
9.	Evaluate the need for the development of additional Source Category Permits to address air toxics issues.

### **Year 2015**

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
1.	Promote the implementation of mobile source air toxics reduction initiatives/programs.
a.	Facilitate the implementation of diesel retrofits.
b.	Continue to support of the SmartWay Transport programs.
i.	Continue to monitor usage of kiosk service systems at diesel truck electrification sites.
ii.	Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate.
c.	Facilitate Delaware appropriate options under the multi-state Transportation & Climate Initiative (TCI) to reduce greenhouse gases and air toxics from the transportation sector.
d.	Continue to identify mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.
2.	Insure continued or improved compliance of stationary sources.
a.	Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT and residual risk standards) in accordance with the applicable compliance monitoring plan.
b.	Perform full compliance evaluations (FCEs) of facilities subject to area source air toxics standards as follows:
i.	The three (3) chrome plating facilities, subject to 1138 Sect 6, covered during the 2014-15 timeframe.
ii.	The one (1) halogenated solvent degreaser, subject to 1138 Sect 8, covered during the 2014-15 timeframe.
iii.	The one (1) hazardous waste combustor, subject to Federal Sub EEE, covered during the 2014-15 timeframe.
iv.	The three (3) municipal solid waste landfills, subject to Federal Sub AAAA, covered during the 2014-15 timeframe.
v.	The two (2) hospital ethylene oxide sterilization facilities, subject to 1138 Sect 9, covered during the 2014-15 timeframe.
vi.	The one (1) lead acid battery manufacturing plant, subject to 1138 Sect 11, covered during the 2014-15 timeframe.
vii.	The one (1) source, subject to electric arc furnace standard (Federal Sub YYYYYY), covered during the 2014-15 timeframe.
viii.	The two (2) plating and polishing operations, subject to 1138 Sect 10, covered during the 2014-15 timeframe.
ix.	40% or ~10 miscellaneous parts and products surface coating facilities, subject to 1138 Sect 14, covered during the 2014-15 timeframe; total potential population is ~25 facilities.
x.	The one (1) asphalt processing and asphalt roofing products manufacturing operation, subject to 1138 Sect 16, covered during the 2014-15 timeframe.
xi.	The six (6) prepared feed operations, subject to Federal Sub DDDDDDD, covered during the 2014-15 timeframe.
xii.	The industrial, commercial, institutional boilers, subject to Federal Sub JJJJJJ, covered during the 2014-15 timeframe.
xiii.	The three (3) gasoline distribution operations, subject to Federal Sub BBBBBB, covered during the 2014-15 timeframe.
xiv.	The fabricated metal products, subject to Federal Sub XXXXXX, covered during the 2014-15 timeframe.

## 2012 - 2016 Air Toxics Strategic Plan

### Year 2015

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
c.	By 9/15, perform compliance evaluations (CE) at area air toxics sources as follows:
i.	25% or ~20 perchloroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~80 facilities.
ii.	25% or ~40 motor vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11 and 1138 Sect 15; total population is ~160 facilities.
iii.	10% or ~60 gasoline delivery vessels; total population is ~600 facilities.
d.	Track annual testing of Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing requirements of Regulation 1124.
e.	Conduct inspections at one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124, during 2015; total population is ~355 facilities.
f.	Continue to implement the Asbestos Demolition/Renovation Program.
i.	Perform site inspections at asbestos demolition/renovation sites.
ii.	Monitor and maintain the Delaware Online Asbestos Notification System (DOANS).
iii.	Educate the public, certified contractors, and professional service firms on the proper removal and disposal of asbestos.
g.	Take enforcement against gasoline dispensing facilities that are non-compliant with Stage 1 and Stage 2 requirements.
h.	Incorporate updated MACT and Residual Risk requirements in air permits.
i.	Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.
ii.	Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation No. 1130, as needed.
i.	Continue to incorporate Area Source Standard requirements into natural minor source permits, as necessary, for
i.	New facilities subject to Gasoline Distribution Operations (Federal Sub BBBB) requirements.
ii.	New and existing sources subject to area source Industrial Commercial Institutional Boiler (Federal Sub JJJJJ) requirements, as appropriate.
iii.	New facilities subject to Fabricated Metal Product (Federal Sub XXXXXX) requirements.
iv.	New sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).
v.	Newly identified existing sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).
vi.	New sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
vii.	Newly identified existing sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
j.	Review and approve Stage I and Stage II permit applications at gasoline dispensing facilities.
k.	Continue Compliance Assistance Program consistent with the Compliance Assistance Oversight Plan for sources subject to the Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
3.	Implement other air toxics-related communications and outreach programs
a.	Continue to implement a diesel anti-idling educational program.
i.	Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.
ii.	Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.
b.	Actively promote the development and implementation of educational programs.
i.	Continue working with the DVRPC on educational programs for . . .
1.	Air Quality Partnership.
ii.	Continue working with the Clean Air Council on educational programs for . . .
1.	Air Quality Partnership.
2.	Diesel Difference Programs.
3.	Delaware Diesel Difference Program.
4.	SmartWay Transport Programs.

## 2012 - 2016 Air Toxics Strategic Plan

### Year 2015

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
iii.	Continue working with EPA Region on educational programs for . . .
1.	SmartWay Transport Programs.
2.	Delaware Diesel Difference Program.
iv.	Continue working with Delaware Division of Energy and Climate on educational programs for the Clean Cities program.
c.	Provide guidance and assistance to DAQ's programs on development and implementation of their educational and outreach programs, when needed.
d.	Continue to collaborate with other DNREC agencies on educational outreach activities associated with promoting the diesel emission reductions.
e.	Continue to participate in Claymont Coalition meetings.
f.	Continue to improve compliance with Delaware's open burning requirements.
i.	Continue to educate the public on Delaware's open burning restrictions.
ii.	Continue to provide non-compliance prevention guidance for open burning activities.
4.	Implement at least one new opportunity to increase small business awareness of actions that small businesses can take to reduce risk from exposure to air toxics including regulatory.
5.	Continue to enhance the value and use of the air toxics information on DAQ's web sites.
a.	Continue to provide pertinent and timely information to the public and regulated community on DAQ's "Proposed Regulations" web site during the adoption of new air toxics standards.
b.	Continue to improve and enhance the content, ease of accessing, and information flow for "Air Toxics" on the DAQ web site.
c.	Review and update, if needed, to continuously improve the information on the Area Source Compliance web pages.
6.	Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.
7.	Implement Air Toxics Area Source Program
a.	Submit Start Action Notices for
i.	Adopting the residual risk standard applicable to Secondary Aluminum Production (Federal Sub RRR).
b.	Complete stringency determinations for
i.	Area standard applicable to Paint and Allied Products Manufacturing (Federal Sub CCCCCC).
c.	Finalize the adoption of area source standards for
i.	Residual risk standard applicable to Chromium Electroplating (Federal Sub T).
ii.	Area standard applicable to Paint and Allied Products Manufacturing (Federal Sub CCCCCC).
d.	Submit delegation package for
i.	Residual risk standard applicable to Chromium Electroplating (Federal Sub T).
ii.	Area standard applicable to Paint and Allied Products Manufacturing (Federal Sub CCCCCC).
e.	Revise existing and develop new control strategies, as needed.
i.	Develop path forward for applicable area source air toxics standards finalized in 2015.
ii.	Develop path forward for residual risk standards applicable area sources finalized in 2015.
f.	Complete initial stringency determination between Federal Area Source Standards vs. existing Delaware regulations and develop regulatory path forward, if necessary.
i.	Residual risk standard applicable to Secondary Aluminum Production (Federal Sub RRR).
ii.	Adopting the area standard applicable to Chemical Preparations Manufacture (Federal Sub BBBBBBB).
8.	As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between DAQ and small businesses.

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2015**

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
9.	Provide support to small businesses on air toxics related issues.
a.	Continue to provide compliance assistance to small business during the implementation of Delaware's air toxics regulations.
b.	Continue to provide compliance assistance to small business as DAQ continues to adopt new regulations applicable area sources.
10.	Continue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.
11.	Continue to improve the inspection and maintenance (I/M) program reporting process.
12.	Continue to provide air toxics-related support to State through . . .
a.	Reviewing of air permits.
b.	Providing current regulatory interpretations.
c.	Advising on likely future trends and actions.
d.	Providing technical support, as needed.

### **Year 2015**

<b>Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics</b>	
1.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
2.	Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics, as needed.
3.	By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.

### **Year 2015**

<b>Air toxics resource development</b>	
1.	Evaluate available training and encourage broader participation in risk-related training.
a.	Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
b.	Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
c.	Evaluate the need for air toxics-related training for staff and present, as needed.
d.	Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.
2.	Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels.
3.	Develop and implement mechanisms to improve air toxics communications.
a.	Continue to implement newly found mechanisms to improve air toxics communications between branches.
b.	Continue to promote open communications between DNREC and small businesses on air toxics issues.



# 2016

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2016**

<b>Implement an on-going program to address the risks from exposure to air toxic</b>	
1.	Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.
a.	Review status and complete year-end status report on the 2014 individual Strategic Plans.
b.	Track implementation and report year-end-status of the 2015 Air Toxics Strategic Plan.
c.	Review status and complete mid-year status report on the 2015 individual Strategic Plans.
d.	Track implementation and report mid-year status on the 2016 Air Toxics Strategic Plan.
e.	Continue to conduct GAP analyses within the strategic planning process and incorporate the results into the development of the 2017 Air Toxics Strategic Plan.
f.	Updating of the Air Toxics Strategic Plan for 2016-2020
i.	Review and revise, if needed, air toxics area source program and timing, as part of the 2016 Air Toxics Strategic Plan by 10/16.
ii.	Coordinate development of the 2016 Air Toxics Strategic Plan.
iii.	Update individual Strategic Plans for 2016-2020.
iv.	Update and finalize 2017 Air Toxics Strategic Plan for years 2017 to 2021.
2.	Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.
3.	Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.
4.	Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.
5.	Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.
6.	Review and revise, if needed, air toxics area source activities and timing as part of the 2017 Air Toxics Strategic Plan by 12/16.
7.	Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.

### **Year 2016**

<b>Build greater understanding of ambient air toxics environment</b>	
1.	Determine ambient air toxics concentrations for selected HAPs in Delaware.
a.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
b.	Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
c.	Continue to collaborate with University of Delaware on air toxics research and special projects.
d.	Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.
e.	Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.
f.	Continue to support the gas chromatographic mass spectrometer platform operations and maintenance through additional monitoring activities.
g.	Undertake new or special monitoring needs that may surface.
2.	Provide air toxics modeling support to meet community and internal needs.

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2016**

<b>Identify potential harm from exposure to air toxics</b>	
1.	Provide modeling support to Engineering & Compliance associated with risk-based permitting decisions, as needed.
2.	Analyze monitoring data from completed special monitoring projects and refine air toxics model, if appropriate.
a.	Analyze ultra-fine particle data collected by DNREC, University of Delaware, and Duke University.
b.	Continue source apportionment analysis focusing on the air toxics of concern, as needed.

### **Year 2016**

<b>Gather information related to air toxics sources</b>	
1.	Provide emissions inventory support to the air toxics education and reduction programs, as required.
2.	Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics, as needed.
3.	By 12/16, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
4.	By 12/16, identify and enter into AFS (via DENs) all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.
5.	Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2016.
6.	Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.

### **Year 2016**

<b>Identify options for reducing air toxics in the environment</b>	
1.	Provide technical assistance on lightering operations to DAQ, as needed.
2.	Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
a.	Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.
b.	Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.
3.	Continue participation in the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.
4.	Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
5.	Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.
a.	Newly proposed amendments to federal air toxics and incinerator standards.
b.	Newly proposed federal residual risk standards.
6.	Continue to implement review protocols and evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the proposed rules, as appropriate.
a.	Newly proposed amendments to federal air toxics and incinerator standards.
b.	Newly proposed federal residual risk standards.
7.	Identify grant and funding opportunities.
a.	Facilitate the identification, preparation and submission for transportation-related grants or other funding.
b.	Identify funding for preferred paths forward, to reduce the risk from mobile source air toxics based on evaluation of information available from DAQ and/or NATA 2008.
8.	Evaluate the need for the development of additional Source Category Permits to address air toxics issues.

## 2012 - 2016 Air Toxics Strategic Plan

### Year 2016

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
1.	Promote the implementation of mobile source air toxics reduction initiatives/programs.
a.	Facilitate the implementation of diesel retrofits.
b.	Continue to support of the SmartWay Transport programs.
i.	Continue to monitor usage of kiosk service systems at diesel truck electrification sites.
ii.	Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate.
c.	Facilitate Delaware appropriate options under the multi-state Transportation & Climate Initiative (TCI) to reduce greenhouse gases and air toxics from the transportation sector.
d.	Continue to identify mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.
2.	Insure continued or improved compliance of stationary sources.
a.	Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT and residual risk standards) in accordance with the applicable compliance monitoring plan.
b.	Perform full compliance evaluations (FCEs) of facilities subject to area source air toxics standards as follows:
i.	The three (3) chrome plating facilities, subject to 1138 Sect 6, covered during the 2016-17 timeframe.
ii.	The one (1) halogenated solvent degreaser, subject to 1138 Sect 8, covered during the 2016-17 timeframe.
iii.	The one (1) hazardous waste combustor, subject to Federal Sub EEE, covered during the 2016-17 timeframe.
iv.	The three (3) municipal solid waste landfills, subject to Federal Sub AAAA, covered during the 2016-17 timeframe.
v.	The two (2) hospital ethylene oxide sterilization facilities, subject to 1138 Sect 9, covered during the 2016-17 timeframe.
vi.	The one (1) lead acid battery manufacturing plant, subject to 1138 Sect 11, covered during the 2016-17 timeframe.
vii.	The one (1) source, subject to electric arc furnace standard (Federal Sub YYYYYY), covered during the 2016-17 timeframe.
viii.	The two (2) plating and polishing operations, subject to 1138 Sect 10, covered during the 2016-17 timeframe.
ix.	40% or ~10 miscellaneous parts and products surface coating facilities, subject to 1138 Sect 14, covered during the 2016-17 timeframe; total potential population is ~25 facilities.
x.	The one (1) asphalt processing and asphalt roofing products manufacturing operation, subject to 1138 Sect 16, covered during the 2016-17 timeframe.
xi.	The six (6) prepared feed operations, subject to Federal Sub DDDDDDD, covered during the 2016-17 timeframe.
xii.	The industrial, commercial, institutional boilers, subject to Federal Sub JJJJJJ, covered during the 2016-17 timeframe, as appropriate.
xiii.	The three (3) gasoline distribution operations, subject to Federal Sub BBBBBB, covered during the 2016-17 timeframe.
xiv.	The fabricated metal products, subject to Federal Sub XXXXXX, covered during the 2014-15 timeframe.
c.	By 9/16, perform compliance evaluations (CE) at area air toxics sources as follows:
i.	25% or ~20 perchloroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~80 facilities.
ii.	25% or ~40 motor vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11 and 1138 Sect 15; total population is ~160 facilities.
iii.	10% or ~60 gasoline delivery vessels; total population is ~600 facilities.
d.	Track annual testing of Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing requirements of Regulation 1124.
e.	Conduct inspections at one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124, during 2016; total population is ~355 facilities.

## 2012 - 2016 Air Toxics Strategic Plan

### Year 2016

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
f.	Continue to implement the Asbestos Demolition/Renovation Program.
i.	Perform site inspections at asbestos demolition/renovation sites.
ii.	Monitor and maintain the Delaware Online Asbestos Notification System (DOANS).
iii.	Educate the public, certified contractors, and professional service firms on the proper removal and disposal of asbestos.
g.	Take enforcement against gasoline dispensing facilities that are non-compliant with Stage 1 and Stage 2 requirements.
h.	Incorporate updated MACT and Residual Risk requirements in air permits.
i.	Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.
ii.	Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation No. 1130, as needed.
i.	Continue to incorporate Area Source Standard requirements into natural minor source permits, as necessary, for
i.	New facilities subject to area source Chromium Electroplating (1138 Sect 6) residual risk requirements.
ii.	New facilities subject to Paint and Allied Products Manufacturing (Federal Sub CCCCCC) requirements.
iii.	New and existing facilities subject to Gasoline Distribution Operations (Federal Sub BBBBBB) requirements.
iv.	New and existing sources subject to area source Fabricated Metal Products (Federal Sub XXXXXX) requirements.
v.	New sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).
vi.	Newly identified existing sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).
vii.	New sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
viii.	Newly identified existing sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
j.	Review and approve Stage I and Stage II permit applications at gasoline dispensing facilities.
k.	Continue Compliance Assistance Program consistent with the Compliance Assistance Oversight Plan for sources subject to the Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
3.	Implement other air toxics-related communications and outreach programs
a.	Continue to implement a diesel anti-idling educational program.
i.	Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.
ii.	Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.
b.	Actively promote the development and implementation of educational programs.
i.	Continue working with the DVRPC on educational programs for . . .
1.	Air Quality Partnership.
ii.	Continue working with the Clean Air Council on educational programs for . . .
1.	Air Quality Partnership.
2.	Diesel Difference Programs.
3.	Delaware Diesel Difference Program.
4.	SmartWay Transport Programs.
iii.	Continue working with EPA Region on educational programs for . . .
1.	SmartWay Transport Programs.
2.	Delaware Diesel Difference Program.
iv.	Continue working with Delaware Division of Energy and Climate on educational programs for the Clean Cities program.
c.	Provide guidance and assistance to DAQ's programs on development and implementation of their educational and outreach programs, when needed.

## 2012 - 2016 Air Toxics Strategic Plan

### Year 2016

<b>Implement appropriate actions to reduce the harm from exposure to air toxics</b>	
d.	Continue to collaborate with other DNREC agencies on educational outreach activities associated with promoting the diesel emission reductions.
e.	Continue to participate in Claymont Coalition meetings.
f.	Continue to improve compliance with Delaware's open burning requirements.
i.	Continue to educate the public on Delaware's open burning restrictions.
ii.	Continue to provide non-compliance prevention guidance for open burning activities.
4.	Implement at least one new opportunity to increase small business awareness of actions that small businesses can take to reduce risk from exposure to air toxics including regulatory.
5.	Continue to enhance the value and use of the air toxics information on DAQ's web sites.
a.	Continue to provide pertinent and timely information to the public and regulated community on DAQ's "Proposed Regulations" web site during the adoption of new air toxics standards.
b.	Continue to improve and enhance the content, ease of accessing, and information flow for "Air Toxics" on the DAQ web site.
c.	Review and update, if needed, to continuously improve the information on the Area Source Compliance web pages.
6.	Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.
7.	Implement Air Toxics Area Source Program
a.	Submit Start Action Notices for
i.	Adopting the area standard applicable to Chemical Preparations Manufacture (Federal Sub BBBBBBBB).
b.	Complete stringency determinations for
i.	Residual risk standard applicable to Secondary Aluminum Production (Federal Sub RRR).
ii.	Area standard applicable to Chemical Preparations Manufacture (Federal Sub BBBBBBBB).
c.	Finalize the adoption of area source standards for
i.	Residual risk standard applicable to Secondary Aluminum Production (Federal Sub RRR).
d.	Submit delegation package for
i.	Residual risk standard applicable to Secondary Aluminum Production (Federal Sub RRR).
e.	Revise existing and develop new control strategies, as needed.
i.	Develop path forward for applicable area source air toxics standards finalized in 2016.
ii.	Develop path forward for residual risk standards applicable area sources finalized in 2016.
8.	As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between DAQ and small businesses.
9.	Provide support to small businesses on air toxics related issues.
a.	Continue to provide compliance assistance to small business during the implementation of Delaware's air toxics regulations.
b.	Continue to provide compliance assistance to small business as DAQ continues to adopt new regulations applicable area sources.
10.	Continue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.
11.	Continue to improve the inspection and maintenance (I/M) program reporting process.
12.	Continue to provide air toxics-related support to State through . . .
a.	Reviewing of air permits.
b.	Providing current regulatory interpretations.
c.	Advising on likely future trends and actions.
d.	Providing technical support, as needed.

## **2012 - 2016 Air Toxics Strategic Plan**

### **Year 2016**

#### **Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics**

1. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
2. Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics, as needed.
3. By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.

### **Year 2016**

#### **Air toxics resource development**

1. Evaluate available training and encourage broader participation in risk-related training.
  - a. Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
  - b. Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
  - c. Evaluate the need for air toxics-related training for staff and present, as needed.
  - d. Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.
2. Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels.
3. Develop and implement mechanisms to improve air toxics communications.
  - a. Continue to implement newly found mechanisms to improve air toxics communications between branches.
  - b. Continue to promote open communications between DNREC and small businesses on air toxics issues.